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Attorneys for Plaintiff DANG

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CUC DANG,

Plaintiff,

vs.

SUTTER'S PLACE, INC. dba BAY 101 or
BAY 101 CASINO, et. al.,

Defendants.

Case No. 10-CV-02181 (RMW) (PSG)

STIPULATION AND

□

**ORDER TO CONTINUE TRIAL
DEADLINES RE EXPERT DISCOVERY**

[Fed. R. Civ. P. 35]

Complaint Filed: May 20, 2010

On December 12, 2011, the Court issued an Order based upon a December 9, 2011 Stipulation submitted by Plaintiff and Defendant for an independent mental examination of Plaintiff to take place on January 24, 2012. Plaintiff has just received notice that her appearance at a Naturalization Oath Ceremony is required on January 24, 2012 to complete her naturalization process to become a US citizen. To permit Plaintiff to attend the Naturalization Oath Ceremony, the parties have agreed to continue Plaintiff's IME for three (3) days. In order to avoid prejudice to Defendant for this brief continuance, the parties have also agreed to continue the trial deadlines pertaining to expert discovery.

Accordingly, Plaintiff, Cuc Dang ("Dang"), and defendant, Sutter's Place, Inc. dba Bay 101 ("Bay 101") (collectively "the parties"), by and through their respective attorneys of record,

hereby submit this stipulation and request that the Court allow them a brief continuance of the trial deadlines pertaining to expert discovery, as follows:

EVENT	FORMER DEADLINE	NEW DEADLINE
Last day to disclose experts	Fri. Mar. 16, 2012	Fri. Mar. 23, 2012
Last day to identify rebuttal/opposition experts and serve rebuttal/opposition reports	Fri. Apr. 13, 2012	Fri. Apr. 20, 2012
Close of expert discovery	Tue. May 1, 2012	Tue. May 8, 2012
Last day to file motions on expert discovery	Mon. May 21, 2012	Fri. May 25, 2012

IT IS SO STIPULATED.

[In accordance with General Order 45.X.B., Ann Nguyen, counsel for Plaintiff, attests that Defendant's counsel, Matthew Schechter, has concurred in this filing.]

Dated: January 11, 2012

McMANIS FAULKNER

/s/

MATTHEW SCHECHTER
Attorneys for Defendant
SUTTER'S PLACE, INC. dba BAY 101

Dated: January 11, 2012

ROBINSON & WOOD, INC.

/s/

ANN A. NGUYEN
Attorneys for Plaintiff,
CUC DANG

ORDER

Good cause appearing therefor, the expert discovery trial deadlines shall be continued as set forth in the above stipulation.

Dated: HEG

Ronald M. Whyte

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA